

Work Wellness. Operating Policy

Data Security

Policy:

Purpose:	To define the standards of data processing required to assure the appropriate protection of valuable commercial and sensitive personal data in compliance with relevant regulation.
Scope:	Any act of data processing, including creation, modification, transport and deletion, performed by a Work Wellness director, employee, sub-contractor or other user for the purpose of operating the Work Wellness business. This policy should be read in conjunction with the Work Wellness Privacy Statement.
Accountable:	Work Wellness Commercial Director.
Responsible:	Work Wellness directors, employees, sub-contractors and any other user who processes data when performing activities in relation to the operation of the Work Wellness business and the delivery or receipt of Work Wellness services.

Contents

1	Information Classification: Public.....	3
1.1	Definition.....	3
1.2	Digital Security Standards.....	3
1.3	Physical Security Standards.....	3
1.4	RACI.....	3
2	Information Classification: Internal.....	4
2.1	Definition.....	4
2.2	Digital Security Standards.....	4
2.3	Physical Security Standards.....	4
2.4	RACI.....	5
3	Information Classification: Confidential.....	6
3.1	Definition.....	6
3.2	Digital Security Standards.....	6
3.3	Physical Security Standards.....	7
3.4	RACI.....	7

1 Information Classification: Public

1.1 Definition

Definition	Examples
<ul style="list-style-type: none"> • Has value when shared publicly. • Public access is mandated by regulation. 	<ul style="list-style-type: none"> • Marketing materials such as advertisements and brochures. • Published annual accounts. • Internet web pages. • Job vacancies. • Case studies.

1.2 Digital Security Standards

In storage	In transit	In use	Deletion
Data storage is duplicated across at least 2 media (e.g., on-line, computer hard drive, physical mass storage).	None	Web site must be HTTPS encrypted.	None

1.3 Physical Security Standards

In storage	In transit	In use	Deletion
None	None	None	None

1.4 RACI

RACI	Who?	What?
Responsible	Author / creator.	<ul style="list-style-type: none"> • Request approval for document classification from Work Wellness Director.
Accountable	Work Wellness Ltd Director.	<ul style="list-style-type: none"> • Approve document classification.

2 Information Classification: Internal

2.1 Definition

Definition	Examples
<ul style="list-style-type: none"> • Has some commercial value / legal sensitivity but is necessary for the operation of the Work Wellness business and the delivery of services. • Disclosure to the employees of Work Wellness and its sub-contractors. • Can be disclosed to specified users outside of Work Wellness and its sub-contractors for a defined purpose and subject to the explicit written approval of a Work Wellness Director. 	<ul style="list-style-type: none"> • Data intended for public disclosure prior to obtaining approval. • Operating policies, procedures and process instructions. • Training materials. • Staff communications. • Phone and email directories. • Marketing or promotional information (prior to authorized release). • Contracts and Service Level Agreements.

2.2 Digital Security Standards

In storage	In transit	In use	Deletion
<ul style="list-style-type: none"> • Laptop, desktop, mass storage backup drive or Microsoft OneDrive accessed by User ID and Password known only to the user or officers of Work Wellness. • Work Wellness employees and sub-contractors use their own passwords and under no circumstances request or offer to share these with anyone else. 	None	Laptops and workstations: <ul style="list-style-type: none"> • Locked with a password protected screen saver when left unattended. 	None

2.3 Physical Security Standards

In storage	In transit	In use	Deletion
<ul style="list-style-type: none"> • Inside the property of the user protected with adequate physical security including: <ul style="list-style-type: none"> • As a minimum: adequate door locks and intruder alarm. • Ideally: Closed Circuit Security Cameras. • Inside the property of the user: <ul style="list-style-type: none"> • As a minimum in a designated room. • Ideally with key or code operated lock access to the designated room. With access to key or code restricted to the user. • Inside the designated room: <ul style="list-style-type: none"> • As a minimum: Cabinet with key or code operated lock. With access to key or code restricted to the user. • Ideally. Cabinet rendered immobile by fixing to floor or wall or by virtue of size and / or weight. 	<ul style="list-style-type: none"> • Posting externally: <ul style="list-style-type: none"> • Inside anonymous packaging. • By registered delivery. • Driven by Car: <ul style="list-style-type: none"> • Store out of sight. • Vehicle locked when unattended. 	<ul style="list-style-type: none"> • On public transport: <ul style="list-style-type: none"> • Not to be displayed on screen or on physical medium when there is any risk of being overlooked by another passenger. 	<ul style="list-style-type: none"> • Paper records shredded and / or incinerated. • End of life hardware (e.g., laptop, desktop, mass storage device) de-gaussed and restored to factory settings.

2.4 RACI

RACI	Who?	What?
Responsible	Author / creator.	<ul style="list-style-type: none"> • Request approval for document classification from Work Wellness Director. • Mark documents with appropriate classification. • Comply with this policy.
Responsible	User	<ul style="list-style-type: none"> • Comply with this policy.
Accountable	Work Wellness Ltd Director.	<ul style="list-style-type: none"> • Approve document classification. • Grant explicit approval to disclosure of document to named users outside of Work Wellness or its Sub-contractors. • Where appropriate, request signature to Non-disclosure Agreement (NDA). • Monitor compliance with this policy.

3 Information Classification: Confidential

3.1 Definition

Definition	Examples
<ul style="list-style-type: none"> • Has significant commercial value or legal sensitivity for Work Wellness, its sub-contractors, clients or client employees. • Disclosure to named users on a strictly “need to know” basis subject to explicit written approval by a Work Wellness Director. • Personally identifiable information / special category data. 	<ul style="list-style-type: none"> • Clinical notes. • Employee assessment reports • GP / treating specialist letters and reports • Health assessment results. • Usernames and passwords. • Company accounts. • Strategies (e.g., plans for business acquisitions, new products).

3.2 Digital Security Standards

In addition to Information Classification: Internal

In storage	In transit	In use	Deletion
<ul style="list-style-type: none"> • Documents protected by strong password protection: minimum of 8 characters; at least one capital letter, numeric digit and special character (!, #, %, \$, £, &, ^). • Security Access Controls ensure data access is segmented. For example: <ul style="list-style-type: none"> • Practitioner read, write and delete access is limited to data about their own clients. • Only Work Wellness Directors have access to company confidential information. 	<p>Email:</p> <ul style="list-style-type: none"> • No PII or SCD should be disclosed within the email itself (e.g., title, subject line, message or file name of any attached documents). • Attached document must be password protected. • Wherever possible, password sent separately to user by another medium (e.g., SMS message). 	<p>Laptops and workstations:</p> <ul style="list-style-type: none"> • Are only used where PII/SCD cannot be viewed on screen by unauthorised individuals. 	<p>Upon expiry of data retention periods:</p> <ul style="list-style-type: none"> • Documents are deleted (including from recycle bins and system archives). • Database records are deleted.

3.3 Physical Security Standards

In addition to Information Classification: Internal

In storage	In transit	In use	Deletion
None	<ul style="list-style-type: none"> • Post by registered delivery. • Ideally: Personally deliver by hand. 	<ul style="list-style-type: none"> • Assessments must be conducted in closed rooms where there is near zero risk of conversation being overheard. • Occupants of the room must not be visible to those outside. 	Upon expiry of data retention periods: <ul style="list-style-type: none"> • Paper records are incinerated.

3.4 RACI

RACI	Who?	What?
Responsible	Author / creator.	<ul style="list-style-type: none"> • Request approval for document classification from Work Wellness Director. • Mark documents with appropriate classification. • Comply with this policy.
Responsible	User	<ul style="list-style-type: none"> • Request approval for access to confidential information where not already provided by an employee or director of Work Wellness Ltd. • Comply with this policy.
Accountable	Work Wellness Ltd Director.	<ul style="list-style-type: none"> • Approve document classification. • Grant explicit approval to disclosure of document to named users outside of Work Wellness or its Sub-contractors. • Where appropriate, request signature to Non-disclosure Agreement (NDA). • Monitor compliance with this policy.

Document Summary:

Title:	Data Security
Policy Library Ref. No.	OP0002
Author:	John Sanderson. Commercial Director. Work Wellness Ltd.
Effective Date:	12 th March 2020.
Current Version:	V2.0. 28 th September 2020.
Next Review Date:	Upon announcement of relevant changes to regulation and industry guidance
Information Classification:	Internal.

- End of Document -